

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

FERDINAND GARCIA RODRIGUEZ
DEBTOR

* CASE NO. 13-06816 ESL
*
* CHAPTER 13
*

**DEBTOR'S MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE FUNDS FROM LIQUIDATION OF SICK LEAVE 2013**

TO THE HONORABLE COURT:

NOW COMES, **FERDINAND GARCIA RODRIGUEZ**, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor's confirmed Plan dated November 18, 2013, provides that debtor's "tax refunds and employer's liquidation of sick days" will be paid into the Plan. See docket no. 20.
2. The debtor has received the 2013 employer's liquidation of sick leave for the year 2013, in the sum of \$1,086.41. Attached is copy of the check as received from the debtor's employer, *Gobierno Municipal de Cidra*, dated March 3, 2014.
3. The debtor respectfully submits to the Court that he needs these funds to pay for: purchase a washing machine and new car tires.
4. The debtor is living within a very "tight" budget which barely covers the household monthly expenses and a Plan payment of \$150.00.
5. Based on the abovestated, the debtor respectfully requests this Court to Order the authorization of the use of these funds to allow the debtor to pay for this expense with the "2013 sick leave liquidation".

WHEREFORE, debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and allow the use of the funds from the

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2013 "sick leave liquidation" by the debtor to pay for the above stated expense.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, Jose Ramon Carrion Morales, Esq.; I also certify that a copy of this motion was sent via US Mail to Ferdinand Garcia Rodriguez, PO Box 9964 Cidra PR 00739; and to all creditors and parties in interest as per the attached master address list.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 17th day of March, 2014.

/s/ Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC #203614
ATTORNEY FOR PETITIONER
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

NOMBRE DEL EMPLEADO

NUMERO DE SEGURO SOCIAL

FECHA
DEL PERÍODO

FERDINAND GARCIA RODRIGUEZ

** 7400

03/03/2014

INGRESOS		DEDUCCIONES		CONTRIBUCIONES	
DESCRIPCION	HORAS	CANTIDAD	DESCRIPCION	CANTIDAD	TIPO
LVE	90.23	1176.41	MEDICARE	17.06	SEG. SOC.
V75			SEGURO CH	70.94	CONT
E75			MAPFRE LI	4.36	
OTH		1106.00	PLAN REFO	84.00	
GRESOS:			SEG. INCAP	371.60	
GRESOS ACUMULADOS:		1176.41	COOPERATI	9.28	
		4892.41	COOPERATI	39.86	
			COOPERATI	39.84	
					TOTAL: 72.94 394.30
					FECHA DEL DEPOSITO 03/07/2014
					NUM. DEL DEPOSITO 0639047
					PAGO NETO
			DEDUCCIONES CORRIENTES:	17.06	CORRIENTE:
			DEDUCCIONES ACUMULADAS:	619.88	ACUMULADO:

639047



CIDRA
BERIOS SHOPPING CENTER
BERRIOS SHPNCNT STATE RD
CIDRA, PR 00739
(787) 714-2700

TRACKING ID# *	
Store ID #	Service Work Order #
10032074213	
Fecha:	2014-03-14
Anotado Por:	NA
Hora De Ingreso:	17:30:39
Fecha/Hora prometida:	2014-03-14 19:00:00
El carro listo partes	
Vigias requeridas por el cliente?	no

CLIENTE:	Ferdinand Garcia	Año:	1999
Dirección:	PO BOX 9964	Marca:	ISUZU TRUCK
Ciudad:	CIDRA	Modelo:	TROOPER
Estado:	PR	Motor:	V6-3494 3.5L DOHC
Código postal:	00739	Número De VIN:	
Teléfono Casero:	(787)702-0870	Número De la Licencia:	1
Teléfono Del Contacto:	(787)702-0870	Mileage adentro y hacia fuera:	1 /
		Color:	

Estimado Total	Cargos Por Piezas	Cargos De Trabajo	Cargos Totales	Fecha Y Hora:	Tarifa De Trabajo
	614.76	39.96	700.55	2014-03-14 17:30:39	80.00/80.00

TYPE	PART	DESCRIPTION	CODE	MECHANIC	HRLY RATE	HRS	QTY	SOURCE	EACH	TOTAL
PK	9084807	TIRE INSTALLATION PACKAGE								
LB		TIRE MOUNTING		N		4		0.00		0.00
LB		WHEEL BALANCE PASSENGER 16-19 & TRUCK		N		4		9.99		39.96
PN	4001	ROAD HAZARD WARRANTY		N		4		16.96		67.84
PN	TV413	30413500PEP 1 1/4 RUBBER VALVE STEM		N		3		3.74		11.22
Package SubTotal :119.02										
PN	90000004790	Futura Scrambler P24570R16 40,000 MILE PRORATED		N		4		132.99		531.96
PN	TV413	30413500PEP 1 1/4 RUBBER VALVE STEM		N		1		3.74		3.74

Parts: 614.76 Labor: 39.96 Other: 0.00 IVU Tax: 39.28 Lcl Tax: 6.55 Total: 700.55

Code Descriptions

N:Nuevo

* Ahora puede seguir el estatus de su Vehículo. Sólo visite www.pepboys.com y entre su numero de Tracking ID (1003 - 2074213), en el E-Service Center.

Store ID - Service Work Order



Cuando necesite un remolque? Llame Gratis a:
800-PEP-BOYS (1-800-737-2697)



221744

A-5805
T-46320/46350

KEEP THIS SLIP FOR REFERENCE

91-11

*****. INVALID RECEIPT - TRAINING. *****
*****. CONSIGUE TODO LO QUE NECESITAS. . . .
*****. A PRECIOS BAJOS. TODOS LOS DIAS. . . .
03/16/14.....11:27:53

ITEMS SOLD 1

IVULOTO: 28NQZ-82192
WM. DRAW023. MAR/22/14

Walmart 
Save money. Live better.

Label Matrix for local noticing

0104-3

Case 13-06816-ESL13

District of Puerto Rico

Old San Juan

Sun Mar 16 08:25:24 AST 2014

COOP A/C CIDRENA

PO BOX 1490

CIDRA, PR 00739-1490

US Bankruptcy Court District of P.R.

Jose V Toledo Fed Bldg & US Courthouse

300 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

COOP A/C CIDRENA

PO BOX 1498

CIDRA, PR 00739-1498

(p) BANK OF AMERICA

PO BOX 982238

EL PASO TX 79998-2238

FIRST BANK

CONSUMER DIVISION CENTER

BANKRUPTCY DIVISION- (CODE 248)

PO BOX 9146, SAN JUAN, PR 00908-0146

FIRST BANK

CONSUMER SERVICE CENTER

BANKRUPTCY DIVISION- (CODE 248)

PO BOX 9146, SAN JUAN, PR 00908-0146

GE Capital Retail Bank

c/o Recovery Management Systems Corp

25 SE 2nd Ave Suite 1120

Miami FL 33131-1605

PEP BOYS

PO BOX 981439

EL PASO, TX 79998-1439

SCOTIABANK

PO BOX 362649

SAN JUAN, PR 00936-2649

SCOTIABANK DE PUERTO RICO

G.P.O. BOX 362649

SAN JUAN, PUERTO RICO 00936-2649

SEARS

PO BOX 6189

SIOUX FALLS, SD 57117-6189

WALMART

PO BOX 530927

ATLANTA, GA 30353-0927

FERNAND GARCIA RODRIGUEZ

PO BOX 9964

CIDRA, PR 00739-8964

JOSE RAMON CARRION MORALES

PO BOX 9023884

SAN JUAN, PR 00902-3884

MONSITA LECAROZ ARRIBAS

OFFICE OF THE US TRUSTEE (UST)

OCHOA BUILDING

500 TANCA STREET SUITE 301

SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO

PO BOX 186

CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

FIA CSNA

PO BOX 982235

EL PASO, TX 79998

End of Label Matrix

Mailable recipients 16

Bypassed recipients 0

Total 16